

Alan Schoenfeld (New Jersey  
Bar No. 285532018)  
Marissa M. Wenzel\*  
Todd Clayton\*  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
(212) 230-8800 (phone)  
(212) 230-8888 (fax)  
alan.schoenfeld@wilmerhale.com  
marissa.wenzel@wilmerhale.com  
todd.clayton@wilmerhale.com

Christopher Davies\*  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
2100 Pennsylvania Avenue NW  
Washington, DC 20037  
(202) 663-6000 (phone)  
(202) 663-6363 (fax)  
christopher.davies@wilmerhale.com

*\*Motion for admission pro hac vice  
forthcoming*

*Attorneys for Defendant Choreograph LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY  
CORPORATION, *et al.*,

Plaintiffs,

v.

No. 2:24-cv-4271

CHOREOGRAPH LLC, *et al.*,

Defendants.

**APPLICATION FOR EXTENSION OF TIME TO  
ANSWER, MOVE, OR OTHERWISE REPLY  
PURSUANT TO LOCAL CIVIL RULE 6.1(B)**

Application is hereby made for a Clerk's Order extending the time within which defendant Choreograph LLC may answer, move, or otherwise reply to the complaint. It is hereby represented that:

1. No previous extension has been requested or obtained;
2. Plaintiffs filed their complaint in the Superior Court of New Jersey, Bergen County, on February 9, 2024.
3. On February 26, 2024, Plaintiffs delivered the complaint to Choreograph's registered agent in New York;
4. Choreograph removed this action to this Court on March 27, 2024.
5. Pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), Choreograph's time to answer, move, or otherwise reply expires on April 3, 2024.
6. Fourteen (14) days from April 3, 2024 is April 17, 2024.

Dated: March 27, 2024  
New York, New York

/s/ Alan Schoenfeld  
Alan Schoenfeld (New Jersey Bar No.  
285532018)  
Marissa M. Wenzel\*  
Todd Clayton\*  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
(212) 230-8800 (phone)  
(212) 230-8888 (fax)  
alan.schoenfeld@wilmerhale.com

marissa.wenzel@wilmerhale.com  
todd.clayton@wilmerhale.com

Christopher Davies\*  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
2100 Pennsylvania Avenue NW  
Washington, DC 20037  
(202) 663-6000 (phone)  
(202) 663-6363 (fax)  
christopher.davies@wilmerhale.com

*Attorneys for Defendant Choreograph  
LLC*

*\*Motion for admission pro hac vice  
forthcoming*

**ORDER**

The above application is ORDERED GRANTED. The time within which defendant Choreograph LLC is required to answer, move, or otherwise reply is extended to \_\_\_\_\_.

MELISSA E. RHOADS, Clerk

Dated: \_\_\_\_\_

By: \_\_\_\_\_  
Deputy Clerk